

**USDC-SDNY
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

DJONIBEK RAHMANKULOV,

Defendant.

No. 20-cr-653 (RA)

ORDER

RONNIE ABRAMS, United States District Judge:

The Court is in receipt of a petition filed by Anton Perevoznikov dated October 24, 2023 indicating that he is “the lawful owner of the \$54,863.28” seized by the FBI on or about August 13, 2020 and asserting that the amount “was not involved in a transaction or attempted transaction . . . in violation of” 18 U.S.C. §§ 1956–57, 1960 or “used or intended to be used in exchange for controlled substances or to traffic controlled substances or to be used to facilitate a violation of Title II of the Controlled Substance Act.” The Government is directed to respond by November 27, 2023.

SO ORDERED.

Dated: November 6, 2023
New York, New York



Ronnie Abrams
United States District Judge

TRULINCS 86355053 - PEREVOZNIKOV, ANTON - Unit: DAN-H-A

FROM: 86355053

TO:

SUBJECT: Honorable Judge Ronnie Abrams

DATE: 10/23/2023 05:46:53 PM

Honorable Judge Ronnie Abrams
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Djonibek Rahmankulov
Asset ID No. 20-FBI-005998

Case No.: S4 20 Cr. 653 (RA)

PETITION.

I am Anton Perevoznikov, attesting and declaring under penalty of perjury, that my petition is not frivolous, and the information provided in support of my petition is true and correct to the best of knowledge and belief.


I am the lawful owner of the \$54,863.28 in United States currency that was seized by the Federal Bureau of Investigation on or about August 13, 2020, from my bank account at TD Bank in Mount Laurel, New Jersey, under the business name Day and Night Sales USA Inc., with account number 4368928251 (which is been closed).

Enclosed, please see Mr. Perevoznikov's bank statements regarding said currency which help to verify the legitimacy of the funds in the above -mentioned bank account which is now closed (Please see Exhibit 1,2) also attaching Exhibit 3 (which is a letter that was mailed to Transnational Criminal Enterprise Unit on 4/19/2023).

Said \$54,863.28 in United States currency was not involved in a transaction or attempted transaction, such as a scheme to launder money or any other fraudulent transaction, in violation of Title 18 U.S.C. sections 1956, 1957 and 1960, nor was it used or intended to be used in exchange for controlled substances or to traffic in controlled substances or to be used to facilitate a violation of the Title II of the Controlled Substance Act, 21 U.S.C. 801 et seq; 21 U.S.C. 881(a)(4).

Pro Se Declaration.

I attest and declare under penalty of perjury that my petition is not frivolous, and the information provided in support of my petition is true and correct to the best of my knowledge and belief.

X 
Anton Perevoznikov
BOP # 86355053
FCI Danbury Federal Correctional Institution
33 1/2 Pembroke Road
Danbury, CT 06811

Date: 10/24/2023



U.S. Department of Justice
*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 13, 2023

Anton Perevoznikov (Register # 86355-053)
FCI Danbury
33 1/2 Pembroke Rd
Danbury, CT 06811

Re: *United States v. Djonibek Rahmankulov*
S4 20 Cr. 653 (RA)

Dear Mr. Perevoznikov:

Please be advised that the Government is in receipt of your "Petition" dated August 28, 2023 asserting an interest in \$54,863.28 in United States currency formerly on deposit in TD Bank, NA account 4368928251, held in the name of Day and Night Sales USA, Inc (the "Subject Account"). As set forth in the notice letter dated August 17, 2023 sent by this office to you, in order to contest forfeiture of an asset you are required to file a petition with the Court by mailing your petition to the Hon. Ronnie Abrams, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007.

As such, mailing your "Petition" to the Government is insufficient and it must be filed with the Court. However, despite this deficiency the Government will take no further action at this time with respect to Subject Account and will allow you an additional thirty (30) days from the receipt of this letter to file your petition with the Court.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: *Cecilia Vogel*
Cecilia Vogel
Samuel Raymond
Thane Rehn
Assistant United States Attorney
Tel. (212) 637-1084/1946/2354



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 17, 2023

Anton Perevoznikov (Register # 86355-053)
FCI Danbury
33 1/2 Pembroke Rd
Danbury, CT 06811

Re: United States v. Djonibek Rahmankulov
S4 20 Cr. 653 (RA)

Dear Sir/Madam:

Enclosed is a copy of the Preliminary Order of Forfeiture as to Specific Property/Money Judgment that has been filed in the above-referenced case, in the Southern District of New York.

Pursuant to Title 21, United States Code, Section 853(n), persons other than the defendant who wish to assert a legal interest in property that has been ordered forfeited to the United States must file a petition for a hearing to adjudicate the validity of their alleged interest in the property with the Court within thirty days (30) from receipt of this notice.

¹ In addition, the petition must be signed by the petitioner under penalty of perjury and must set forth the nature and extent of the petitioner's right, title, or interest in the property, the time and circumstances of the petitioner's acquisition of the right, title, or interest in the property, any additional facts supporting the claim, and the relief sought. ▸

Very truly yours,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: Cecilia Vogel
Cecilia Vogel
Assistant United States Attorney
Tel. (212) 637-1084

Encs.

TRULINCS 86355053 - PEREVOZNIKOV, ANTON - Unit: DAN-H-A

FROM: 86355053

TO:

SUBJECT: mailing info, direct deposit

DATE: 10/23/2023 06:15:56 PM

Your Honor,

I hope this letter finds you well. I recently submitted a petition for the return of seized property in the amount of \$54,863.28. Should my petition be granted, can the check please be ordered to be mailed directly to: 9650 Sunnywood TRL, South Lyon, MI 48178. Alternatively, should direct deposit be a possibility on your end, the money can be directly sent to my account Routing #065000090, account #7528866436.

Thank you in advance for your assistance in this matter.



10/24/2023

**Bank**

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STATEMENT OF ACCOUNT

DAY AND NIGHT SALES USA INC

Page: 3 of 4
 Statement Period: Jun 01 2020-Jun 30 2020
 Cust Ref #: 4368928251-713-E-***
 Primary Account #: 436-8928251

DAILY ACCOUNT ACTIVITY

Electronic Deposits (continued)

POSTING DATE	DESCRIPTION	AMOUNT
06/24	ACH DEPOSIT, NYS DOL UI DD UI DD J368D5593 17	346.00
06/25	CCD DEPOSIT, SBAD TREAS 310 MISC PAY 263553801073000	53,900.00
06/26	CCD DEPOSIT, WITHBEHALF LLC EDI PYMNTS Z501066TDHH	17,640.00
Subtotal:		80,746.00

Checks Paid

No. Checks: 1

*Indicates break in serial sequence or check processed electronically and listed under Electronic Payments

DATE	SERIAL NO.	AMOUNT
06/08	111	2,500.00
Subtotal:		2,500.00

Electronic Payments

POSTING DATE	DESCRIPTION	AMOUNT
06/04	ELECTRONIC PMT-WEB, CITI CARD ONLINE PAYMENT 420132840273047	239.40
06/05	ACH DEBIT, E*TRADE ACH TRNSFR 46847500482	5,000.00
06/05	ACH DEBIT, E*TRADE ACH TRNSFR 46863529482	5,000.00
06/05	ELECTRONIC PMT-WEB, MBFS WEB PAY 5001273188001	3,259.04
06/08	ACH DEBIT, E*TRADE ACH TRNSFR 46954348482	10,000.00
06/15	ACH DEBIT, PROG GARDEN ST INS PREM 936214051 Anton	238.60
06/22	ELECTRONIC PMT-WEB, AMEX EPAYMENT ACH PMT M3268	3,961.37
Subtotal:		27,698.41

Service Charges

POSTING DATE	DESCRIPTION	AMOUNT
06/30	MAINTENANCE FEE	10.00
Subtotal:		10.00

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE
05/31	41,583.84	06/17	23,606.80
06/03	47,951.84	06/22	19,645.43
06/04	47,712.44	06/24	20,591.43
06/05	34,453.40	06/25	74,491.43
06/08	21,953.40	06/26	92,131.43
06/10	22,899.40	06/30	92,121.43
06/15	22,660.80		

**Bank**

America's Most Convenient Bank®

STATEMENT OF ACCOUNT

DAY AND NIGHT SALES USA INC

Page: 3 of 4
 Statement Period: Jul 01 2020-Jul 31 2020
 Cust Ref #: 4368928251-713-E-***
 Primary Account #: 436-8928251

DAILY ACCOUNT ACTIVITY

Checks Paid		No. Checks: 1	*Indicates break in serial sequence or check processed electronically and listed under Electronic Payments	
DATE	SERIAL NO.		AMOUNT	
07/07	112		2,500.00	
			Subtotal:	2,500.00

Electronic Payments

POSTING DATE	DESCRIPTION	AMOUNT
07/07	ELECTRONIC PMT-WEB, WELLS FARGO CARD CCPYMT 90154509611240	4,397.70
07/08	ELECTRONIC PMT-WEB, MBFS WEB PAY 5001273188001	3,259.04
07/14	ACH DEBIT, PROG GARDEN ST INS PREM 936214051 Anton	290.41
07/16	CCD DEBIT, AMEX EPAYMENT ACH PMT W6432	1,040.94
07/23	ELECTRONIC PMT-WEB, WELLS FARGO CARD CCPYMT 90154509611240	3,106.62
		Subtotal: 12,094.71

Other Withdrawals

POSTING DATE	DESCRIPTION	AMOUNT
07/09	DEBIT	17,000.00
07/24	WIRE TRANSFER OUTGOING, Gift And Works Usa	99,713.00
		Subtotal: 116,713.00

Service Charges

POSTING DATE	DESCRIPTION	AMOUNT
07/31	MAINTENANCE FEE	10.00
		Subtotal: 10.00

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE
06/30	92,121.43	07/15	68,512.28
07/01	93,067.43	07/16	67,471.34
07/06	94,067.43	07/22	168,417.34
07/07	87,169.73	07/23	165,310.72
07/08	84,856.69	07/24	65,597.72
07/09	67,856.69	07/29	66,543.72
07/14	67,566.28	07/31	66,533.72

exhibit (3)

TRULINCS 86355053 - PEREVOZNIKOV, ANTON - Unit: DAN-H-A

FROM: 86355053

TO:

SUBJECT: Asset ID- 20-FBI-005998

DATE: 04/19/2023 09:44:41 AM

Hello, I would like get an update on Asset: ID # 20-FBI-005998 (seizure property money)

I mailed a certified letter on January 18th,2023 but I did not get back any answers or updates and it's already April. I don't have any attorney representing me at this time or at the time when I first requested updates because I just can't afford one. Recently my friend was contacting your office on my behalf ,calling the number that I have on document: 212-384-1000 to find out what the status is but he was told that,that information is private and can't be disclosed to him. I don't have any way to call and to speak to someone to find out more information. Please, I am asking you to return my seized funds,seizure# 3540210005 from back in August 13th ,2020.

I lawfully earned this money working very hard and it belongs to me and only me. Please, I really need this money to cover my bills and help my family, I really depend on this a lot .Its been more than 2 years now. I cant afford to pay my prior attorney Mr. Lazzaro's fees anymore to handle this situation, he promised me that I will be getting my funds back 2 years ago but he hasn't even provided me any updates at all .Instead he lied to me and asked me to pay him more for work which he never did finished. I cant keep paying him for it anymore which is why I am writing this on my own. Thank you.

Respectfully,

Anton Perevoznikov

